Exhibit A

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7 *Attorneys for Plaintiff*
   TESLA, INC.

8
                    UNITED STATES DISTRICT COURT
9
                   NORTHERN DISTRICT OF CALIFORNIA
10
                      SAN FRANCISCO DIVISION
11

12   )
    TESLA, INC., a Delaware corporation,) Case No. 19-cv-01463-VC
13   )
            Plaintiff,   ) **PLAINTIFF TESLA, INC.'S SECOND**
14   ) **SET OF REQUESTS FOR ADMISSION**
    v.   ) **TO DEFENDANT GUANGZHI CAO**
15   )
    GUANGZHI CAO, an individual,   )
16   )
            Defendant.   )
17   )
)
18 _____)

19 PROPOUNDING PARTY: Defendant TESLA, INC.

20 RESPONDING PARTY: Plaintiff GUANGZHI CAO

21 SET NUMBER: TWO

22   Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Tesla, Inc.

23 ("Tesla") hereby submits the following requests for admission to Defendant Guangzhi

24 Cao ("Cao").

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Case No. 19-cv-01463-VC

1   to determine the validity of YOUR objection or claim of privilege;

2   and/or

3   b. Provide information responsive to the request to the extent not

4   privileged and set forth all reasons and the underlying factual basis

5   for YOUR objection or claim of privilege in sufficient detail to

6   permit the court to determine the validity of YOUR objection or

7   claim of privilege as to the remainder of the request.

8   7.   Unless otherwise stated, the time period covered by these requests for

9   admission is April 24, 2017 to present.

10   **DEFINITIONS**

11   1.   "TESLA" means Plaintiff Tesla, Inc.

12   2.   "YOU" or "YOUR" means Defendant Guangzhi Cao.

13   3.   "XMOTORS" means XMotors.ai, Inc. or any of XMotors.ai, Inc.'s parents,

14   subsidiaries, or affiliates.

15   4.   "AUTOPILOT SOURCE CODE" means any source code from TESLA's

16   firmware, Autopilot, or neural net source code repositories.

17   5.   "ACCESSIBLE" means retrievable, obtainable, able to be examined, able to

18   be acquired, available, or reachable. The term ACCESSIBLE should be construed in its

19   broadest possible sense, and includes items made ACCESSIBLE by inadvertence or

20   mistake and items made ACCESSIBLE by remote or virtual means.

21   6.   "SAVE" or "SAVED" means to cause an electronic device to store data of

22   any kind for any period of time, intentionally or unintentionally.

23   7.   "UPLOAD" or "UPLOADED" means to transfer (or to cause to be

24   transferred) data of any kind from one electronic device or account to another electronic

25   device or account via the internet, intentionally or unintentionally.

26   8.   "ICLOUD ACCOUNT" means the Apple iCloud account that YOU

27   described in paragraph 3.h. of YOUR April 5, 2019 Certification By Guangzhi Cao

28   Regarding Electronic Data Sources.

9.   "PERSONAL MACBOOK" means an Apple MacBook Pro 13" laptop computer identified as item 2 in Exhibit A of YOUR April 5, 2019 Certification By Guangzhi Cao Regarding Electronic Data Sources.

10.   "IMAC" means an Apple iMac desktop computer identified as item 3 in Exhibit A of YOUR April 5, 2019 Certification By Guangzhi Cao Regarding Electronic Data Sources.

11.   "TESLA LAPTOP" means an Apple MacBook Pro 15" serial number LUSC02T219UH040 issued to YOU by TESLA for use during YOUR employment at TESLA.

12.   "SANDISK CRUZER USB" means the SanDisk USB drive identified on paragraph 5 of the April 5, 2019 Certification By Guangzhi Cao Regarding Electronic Data Sources, and purportedly destroyed by YOU.

13.   "XMOTORS LAPTOP" means an Apple MacBook Pro (15-inch, 2018) laptop provided to YOU for YOUR use during YOUR employment with XMOTORS and produced by XMOTORS to Tesla in this litigation.

14.   "SEAGATE EXTERNAL HD" means a Seagate SRD00F2 Desktop Expansion Drive 2TB with serial number NA4MYHQZ identified as item 4 in Exhibit A of YOUR April 5, 2019 Certification By Guangzhi Cao Regarding Electronic Data Sources.

REQUESTS FOR ADMISSION

Request for Admission No. 22: Admit that you installed ICLOUD on YOUR TESLA LAPTOP on April 25, 2017.

Request for Admission No. 23: Admit that you created a folder on YOUR TESLA LAPTOP called "iCloud Drive (Archive)" on April 25, 2017.

Request for Admission No. 24: Admit that you created a folder on YOUR TESLA LAPTOP called "iCloud Drive (Archive) - 1" on March 25, 2018.

Request for Admission No. 25: Admit that you created a folder on YOUR TESLA LAPTOP called "iCloud Drive (Archive) - 2" on November 13, 2018.

1 **Request for Admission No. 26:** Admit that the folder "iCloud Drive (Archive)" that

2 resided on YOUR TESLA LAPTOP contains files that were stored in YOUR ICLOUD

3 ACCOUNT.

4 **Request for Admission No. 27:** Admit that the folder "iCloud Drive (Archive) - 1" that

5 resided on YOUR TESLA LAPTOP contains files that were stored in YOUR ICLOUD

6 ACCOUNT.

7 **Request for Admission No. 28:** Admit that the folder "iCloud Drive (Archive) - 2" that

8 resided on YOUR TESLA LAPTOP contains files that were stored in YOUR ICLOUD

9 ACCOUNT.

10 **Request for Admission No. 29:** Admit that YOU SAVED AUTOPILOT SOURCE

11 CODE in the folder "iCloud Drive (Archive)" on YOUR TESLA LAPTOP.

12 **Request for Admission No. 30:** Admit that YOU SAVED AUTOPILOT SOURCE

13 CODE in the folder "iCloud Drive (Archive) - 1" on YOUR TESLA LAPTOP.

14 **Request for Admission No. 31:** Admit that YOU SAVED AUTOPILOT SOURCE

15 CODE in the folder "iCloud Drive (Archive) - 2" on YOUR TESLA LAPTOP.

16 **Request for Admission No. 32:** Admit that AUTOPILOT SOURCE CODE was

17 synchronized from YOUR ICLOUD ACCOUNT to the folder "iCloud Drive (Archive)"

18 on YOUR TESLA LAPTOP.

19 **Request for Admission No. 33:** Admit that AUTOPILOT SOURCE CODE was

20 synchronized from YOUR ICLOUD ACCOUNT to the folder "iCloud Drive (Archive) –

21 1" on YOUR TESLA LAPTOP.

22 **Request for Admission No. 34:** Admit that AUTOPILOT SOURCE CODE was

23 synchronized from YOUR ICLOUD ACCOUNT to the folder "iCloud Drive (Archive) -

24 2" on YOUR TESLA LAPTOP.

25 **Request for Admission No. 35:** Admit that YOU first moved AUTOPILOT SOURCE

26 CODE to YOUR IMAC no later than August 21, 2017.

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1   **Request for Admission No. 45:** Admit that the file called ACDC.zip that existed on

2   YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

3   Documents/com~Apple~CloudDocs/" on December 26, 2018 contained AUTOPILOT

4   SOURCE CODE.

5   **Request for Admission No. 46:** Admit that the file called ACDC.zip that existed on

6   YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

7   Documents/com~Apple~CloudDocs/" on January 9, 2019 contained AUTOPILOT

8   SOURCE CODE.

9   **Request for Admission No. 47:** Admit that the file called ACDC.zip that existed on

10   YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

11   Documents/com~Apple~CloudDocs/" on February 3, 2019 contained AUTOPILOT

12   SOURCE CODE.

13   **Request for Admission No. 48:** Admit that, on March 10, 2019, a file named ACDC.zip

14   existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile Documents/

15   com~apple~CloudDocs/.Trash/".

16   **Request for Admission No. 49:** Admit that, on March 10, 2019, a directory named

17   ACDC 2 existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

18   Documents/

19   com~apple~CloudDocs/.Trash/".

20   **Request for Admission No. 50:** Admit that, on March 10, 2019, a directory named

21   Autopilot existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

22   Documents/

23   com~apple~CloudDocs/.Trash/".

24   **Request for Admission No. 51:** Admit that, on March 10, 2019, a directory named

25   Autopilotcv-pytorch existed on YOUR IMAC in the folder

26   "/Users/wuyue1987/Library/Mobile Documents/

27   com~apple~CloudDocs/.Trash/".

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1   **Request for Admission No. 52:** Admit that, on March 10, 2019, a directory named

2   Autopilotcv-pytorch 2 existed on YOUR IMAC in the folder

3   "/Users/wuyue1987/Library/Mobile Documents/

4   com~apple~CloudDocs/.Trash/".

5   **Request for Admission No. 53:** Admit that, on March 10, 2019, a directory named

6   Autopilotcv-pytorch 3.42.08 PM existed on YOUR IMAC in the folder

7   "/Users/wuyue1987/Library/Mobile Documents/

8   com~apple~CloudDocs/.Trash/".

9   **Request for Admission No. 54:** Admit that, on March 10, 2019, a directory named

10   Autopilotcv-tensorflow existed on YOUR IMAC in the folder

11   "/Users/wuyue1987/Library/Mobile Documents/

12   com~apple~CloudDocs/.Trash/".

13   **Request for Admission No. 55:** Admit that, on March 10, 2019, a directory named

14   Firmware.json existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

15   Documents/

16   com~apple~CloudDocs/.Trash/".

17   **Request for Admission No. 56:** Admit that the file named ACDC.zip that existed on

18   YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile Documents/

19   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

20   CODE.

21   **Request for Admission No. 57:** Admit that the directory named ACDC 2 that existed on

22   YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile Documents/

23   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

24   CODE.

25   **Request for Admission No. 58:** Admit that the directory named Autopilot that existed on

26   YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile Documents/

27   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

28   CODE.

1   **Request for Admission No. 59:** Admit that the directory named Autopilotcv-pytorch that

2   existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile Documents/

3   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

4   CODE.

5   **Request for Admission No. 60:** Admit that the directory named Autopilotcv-pytorch 2

6   that existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

7   Documents/

8   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

9   CODE.

10   **Request for Admission No. 61:** Admit that the directory named Autopilotcv-pytorch

11   3.42.08 PM that existed on YOUR IMAC in the folder

12   "/Users/wuyue1987/Library/Mobile Documents/

13   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

14   CODE.

15   **Request for Admission No. 62:** Admit that the directory named Autopilotcv-tensorflow

16   that existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile

17   Documents/

18   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

19   CODE.

20   **Request for Admission No. 63:** Admit that the directory named Firmware.json that

21   existed on YOUR IMAC in the folder "/Users/wuyue1987/Library/Mobile Documents/

22   com~apple~CloudDocs/.Trash/" on March 10, 2019 contained AUTOPILOT SOURCE

23   CODE.

24   **Request for Admission No. 64:** Admit that, on January 6, 2019, a file named ACDC.zip

25   existed on YOUR PERSONAL MACBOOK in the folder

26   "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

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1 **Request for Admission No. 65:** Admit that, on January 6, 2019, a directory named

2 ACDC existed on YOUR PERSONAL MACBOOK in the folder

3 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

4 **Request for Admission No. 66:** Admit that, on January 6, 2019, a directory named

5 ACDC 2 existed on YOUR PERSONAL MACBOOK in the folder

6 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

7 **Request for Admission No. 67:** Admit that, on January 6, 2019, a directory named

8 Autopilot existed on YOUR PERSONAL MACBOOK in the folder

9 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

10 **Request for Admission No. 68:** Admit that, on January 6, 2019, a directory named

11 Autopilotcv-pytorch existed on YOUR PERSONAL MACBOOK in the folder

12 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

13 **Request for Admission No. 69:** Admit that, on January 6, 2019, a directory named

14 Autopilotcv-pytorch 2 existed on YOUR PERSONAL MACBOOK in the folder

15 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

16 **Request for Admission No. 70:** Admit that, on January 6, 2019, a directory named

17 Autopilotcv-pytorch 3.42.08 PM existed on YOUR PERSONAL MACBOOK in the

18 folder "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

19 **Request for Admission No. 71:** Admit that, on January 6, 2019, a directory named

20 Autopilotcv-tensorflow existed on YOUR PERSONAL MACBOOK in the folder

21 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

22 **Request for Admission No. 72:** Admit that, on January 6, 2019, a directory named

23 firmware.json existed on YOUR PERSONAL MACBOOK in the folder

24 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash".

25 **Request for Admission No. 73:** Admit that the file named ACDC.zip that existed on

26 YOUR PERSONAL MACBOOK in the folder "/Users/guangzhicao/Library/Mobile

27 Documents/com~apple~CloudDocs/.Trash" on January 6, 2019 contained AUTOPILOT

28 SOURCE CODE.

1   **Request for Admission No. 74:** Admit that the directory named ACDC that existed on

2   YOUR PERSONAL MACBOOK in the folder "/Users/guangzhicao/Library/Mobile

3   Documents/com~apple~CloudDocs/.Trash" on January 6, 2019 contained AUTOPILOT

4   SOURCE CODE.

5   **Request for Admission No. 75:** Admit that the directory named ACDC 2 that existed on

6   YOUR PERSONAL MACBOOK in the folder "/Users/guangzhicao/Library/Mobile

7   Documents/com~apple~CloudDocs/.Trash" on January 6, 2019 contained AUTOPILOT

8   SOURCE CODE.

9   **Request for Admission No. 76:** Admit that the directory named Autopilot that existed on

10 YOUR PERSONAL MACBOOK in the folder "/Users/guangzhicao/Library/Mobile

11 Documents/com~apple~CloudDocs/.Trash" on January 6, 2019 contained AUTOPILOT

12 SOURCE CODE.

13 **Request for Admission No. 77:** Admit that the directory named Autopilotcv-pytorch that

14 existed on YOUR PERSONAL MACBOOK in the folder

15 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash" on

16 January 6, 2019 contained AUTOPILOT SOURCE CODE.

17 **Request for Admission No. 78:** Admit that the directory named Autopilotcv-pytorch 2

18 that existed on YOUR PERSONAL MACBOOK in the folder

19 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash" on

20 January 6, 2019 contained AUTOPILOT SOURCE CODE.

21 **Request for Admission No. 79:** Admit that the directory named Autopilotcv-pytorch

22 3.42.08 PM that existed on YOUR PERSONAL MACBOOK in the folder

23 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash" on

24 January 6, 2019 contained AUTOPILOT SOURCE CODE.

25 **Request for Admission No. 80:** Admit that the directory named Autopilotcv-tensorflow

26 that existed on YOUR PERSONAL MACBOOK in the folder

27 "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash" on

28 January 6, 2019 contained AUTOPILOT SOURCE CODE.

1   **Request for Admission No. 81:** Admit that the directory named firmware.json that

2   existed on YOUR PERSONAL MACBOOK in the folder

3   "/Users/guangzhicao/Library/Mobile Documents/com~apple~CloudDocs/.Trash" on

4   January 6, 2019 contained AUTOPILOT SOURCE CODE.

5   **Request for Admission No. 82:** Admit that YOU created at least one file named

6   ACDC.zip.

7   **Request for Admission No. 83:** Admit that YOU created more than one file named

8   ACDC.zip.

9   **Request for Admission No. 84:** Admit that at least one iteration of ACDC.zip created by

10   YOU contained a file named VisionFramework-Overiew.pptx.

11   **Request for Admission No. 85:** Admit that at least one iteration of ACDC.zip created by

12   YOU contained a file named Autopilot.zip.

13   **Request for Admission No. 86:** Admit that at least one iteration of ACDC.zip created by

14   YOU contained a file named cv.zip.

15   **Request for Admission No. 87:** Admit that Autopilot.zip contains AUTOPILOT

16   SOURCE CODE.

17   **Request for Admission No. 88:** Admit that cv.zip contains AUTOPILOT SOURCE

18   CODE.

19   **Request for Admission No. 89:** Admit that at least one iteration of ACDC.zip that YOU

20   created from April 25, 2017 to present contained AUTOPILOT SOURCE CODE.

21   **Request for Admission No. 90:** Admit that more than one iteration of ACDC.zip that

22   YOU created from April 25, 2017 to present contained AUTOPILOT SOURCE CODE.

23   **Request for Admission No. 91:** Admit that every iteration of ACDC.zip that YOU

24   created from April 25, 2017 to present contained AUTOPILOT SOURCE CODE.

25   **Request for Admission No. 92:** Admit that at least one iteration of ACDC.zip that YOU

26   SAVED on YOUR IMAC contained AUTOPILOT SOURCE CODE.

27   **Request for Admission No. 93:** Admit that more than one iteration of ACDC.zip that

28   YOU SAVED on YOUR IMAC contained AUTOPILOT SOURCE CODE.

1 **Request for Admission No. 94:** Admit that every iteration of ACDC.zip that YOU

2 SAVED on YOUR IMAC contained AUTOPILOT SOURCE CODE.

3 **Request for Admission No. 95:** Admit that at least one iteration of ACDC.zip that YOU

4 SAVED on YOUR IMAC and stored there after January 4, 2019 contained AUTOPILOT

5 SOURCE CODE.

6 **Request for Admission No. 96:** Admit that more than one iteration of ACDC.zip that

7 YOU SAVED on YOUR IMAC and stored there after January 4, 2019 contained

8 AUTOPILOT SOURCE CODE.

9 **Request for Admission No. 97:** Admit that every iteration of ACDC.zip that YOU

10 SAVED on YOUR IMAC and stored there after January 4, 2019 contained AUTOPILOT

11 SOURCE CODE.

12 **Request for Admission No. 98:** Admit that YOU first connected the SANDISK

13 CRUZER USB to YOUR IMAC at some time between November 14, 2018 and

14 December 26, 2018.

15 **Request for Admission No. 99:** Admit that you SAVED ACDC.zip on the SANDISK

16 CRUZER USB using YOUR IMAC at least one time.

17 **Request for Admission No. 100:** Admit that YOU connected the SANDISK CRUZER

18 USB to YOUR XMOTORS LAPTOP at least one time.

19 **Request for Admission No. 101:** Admit that on December 12, 2018, YOU began

20 downloading a file named ACDC.zip from YOUR ICLOUD ACCOUNT to YOUR IMAC

21 using the Apple Safari browser.

22   **Request for Admission No. 102:** Admit that on March 20, 2019, ACDC.zip was

23 ACCESSIBLE to you in a Time Machine backup SAVED on your SEAGATE

24 EXTERNAL HD.

25 **Request for Admission No. 103:** Admit that a Time Machine backup of your IMAC

26 SAVED on your SEAGATE EXTERNAL HD dated February 3, 2019 contains

27 ACDC.zip.

28